

UNITED STATES DISTRICT COURT

FOR THE

MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Plaintiff

vs.

DAN ZHANG

Defendant

CIVIL NO.

COMPLAINT

The United States of America, on behalf of its Agency, Department of Health and Human Services, by its specially appointed counsel, Michael McKeever of KML LAW GROUP, P.C., represents as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
2. The last-known address of the Defendant, DAN ZHANG (“Defendant”) is 19 Monterey Building, Hershey, PA 17033.
3. That the defendant is indebted to the plaintiff in principal amount of \$46,092.00, plus interest in the amount of \$30,067.14, for a total of \$76,159.14. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit “A” (“Certificate of Indebtedness”).
4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;

(A) In the amount \$76,159.14.

(B) Interest from the date of judgment at the legal rate of interest in effect
on the date of judgment until paid in full.

(C) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of
any judgment rendered in its favor in this action from any debt accruing.

United States of America by and through
its specially assigned counsel
KML Law Group, P.C.

By: /s/ Michael McKeever, Esq.

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